

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MARIA GUTIERREZ, a Texas resident, Individually and as Next Friend of A.L., a Minor	§ § § § §	
Plaintiffs,	§	CIVIL ACTION NO. 2:19-cv-00058
	§	
v.	§	
	§	
TOYOTA MOTOR MANUFACTURING, KENTUCKY, INC., et al.	§ § § §	JURY DEMAND
Defendants.	§	

**PLAINTIFF’S MOTION TO SHORTEN TIME TO RESPOND TO HER MOTION
COMPEL INITIAL DISCLOSURES & DEPOSITIONS IN THE UNITED STATES**

Pursuant to Local Rule CV-7(e), Plaintiff requests this Court shorten Toyota Motor Corporation (TMC)'s response time to Plaintiff's Motion to Compel Initial Disclosures and Depositions in the United States. The entire schedule set forth in the Docket Control Order is predicated on compliance with this Court's disclosure schedule. Any further delay will compromise Plaintiff's ability to identify Toyota witnesses for deposition, conduct the depositions, and supply the relevant information to her expert witnesses with time to meet the deadline for Rule 26 reports. Accordingly, Plaintiff prays the Court exercise its discretion pursuant to Local Rule CV-7(e) and shorten TMC's response time to three business days.

Respectfully submitted,

/s/ Jeffrey T. Embry
Jeffrey T. Embry
State Bar No. 24002052
Attorney-In-Charge
Christopher P. Peirce
State Bar No. 24046604
Hossley Embry, LLP
515 S. Vine Ave.
Tyler, Texas 75702
Ph. 903-526-1772
Fax. 903-526-1773
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

Plaintiff's counsel attempted in good faith to reach Mr. David Stone, lead counsel for TMC, on July 9, 2019 at his office but was unable to reach him.

/s/Jeffrey T. Embry
Jeffrey T. Embry

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all known counsel of record through the Court's electronic filing system on this 9th day of July 2019.

/s/Jeffrey T. Embry
Jeffrey T. Embry